

Hueston McNulty

ATTORNEYS AT LAW

ROBERT J. HUESTON**
SAMUEL J. McNULTY**^o⁺[^]
BRIAN J. McNULTY**
EDWARD J. TURRO*
BRIAN J. MCINTYRE**
DONNA B. SHAW*
ANTHONY J. CHIRLES, JR.*[‡]

256 COLUMBIA TPK. SUITE 207
FLORHAM PARK, NJ 07932

WWW.HUESTONMCNULTY.COM

DEFENSE AND GENERAL COUNSEL
SERVING NEW JERSEY, NEW YORK & PENNSYLVANIA

OF COUNSEL
AIMEE H. McNULTY **
JOHN F. GAFFNEY **^o
CAROL A. SCHRAGER ^o
THOMAS VINCENT GIAIMO **
BRYAN M. BUFFALINO **
WILLIAM J. MENDRZYCKI **
BRIAN A. BIRENBACH ^o^o

^o CERTIFIED CIVIL TRIAL ATTORNEY
* MEMBER OF NJ BAR
^o MEMBER OF NY BAR
* MEMBER OF CO BAR
[‡] MEMBER OF DC BAR
^o MEMBER OF FL BAR
+ MEMBER OF PA BAR
[^] MEMBER, COLLEGE OF COMMUNITY
ASSOCIATION ATTORNEYS

TEL: 973-377-0200 / FAX: 973-377-6328
INFO@HUESTONMCNULTY.COM

October 17, 2023

VIA NEW JERSEY LAWYERS SERVICE

Hon. Christine M. Gravelle
United States Bankruptcy Court for the District of New Jersey
Clarkson S. Fisher Federal Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: In Re: Allen Middleton
Bankruptcy Case No.: 19-15753 CMG
Our File No.: 10290-5

U.S. BANKRUPTCY COURT
FILED
TRENTON, NJ
10/18/23 1:18 PM
JENNIFER A. MIDDLETON
BY: *Jennif. A. Middleton*
DEPUTY CLERK

Dear Judge Gravelle:

We represent Creditor, The Oaks at North Brunswick Condominium Association, Inc. (the "Association"), in the above-referenced matter.

The hearing concerning debtor, Allen Middleton's request for confirmation of a modified Chapter 13 Plan is scheduled for November 1, 2023.

The Association objects to the proposed modified Plan that debtor's counsel filed with the Court on September 7, 2023. As of September 30, 2023, the post-petition amount due to the Association is \$15,937.50, which exceeds the amount stated in the proposed Plan. Also, the Association seeks to file a lien against the debtor's real property with the county clerk's office.

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As such, we request that the court deny the debtor's proposed modified Chapter 13 Plan in its current form.

Respectfully submitted,
HUESTON McNULTY, P.C.

Anthony J. Chirles Jr

By: _____
ANTHONY J. CHIRLES JR., ESQ.

AJC/agf
Encl.

cc: Kevin Delyon, Esq. (*Via Email*)
Albert Russo, Standing Chapter 13 Trustee (*Via First Class Mail*)

**Hueston
McNulty, P.C.**

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